Exhibit M

Ariana Lindermayer

From: Ariana Lindermayer
Sent: Thursday, April 16, 2015 10:36 AM
To: rsimonesq@yahoo.com
Cc: ahmad@NewYorkConsumerAttorney.com; Carolyn E. Coffey
Subject: RE: Tuhin v. NYMG - discovery

Richard, I am following up on my email below. When we spoke last week, you said you would respond on Monday.

Ariana

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From: Ariana Lindermayer
Sent: Tuesday, April 07, 2015 7:26 PM
To: rsimonesq@yahoo.com
Cc: ahmad@NewYorkConsumerAttorney.com; Carolyn E. Coffey
Subject: Tuhin v. NYMG - discovery

Richard, I am writing to discuss the following outstanding discovery matters:

1. Your clients' discovery responses assert that "plaintiff testified he came to the dealership as it was near his residence and he hadn't viewed any advertising" and "Tuhin didn't respond to an advertisement." This is incorrect; Mr. Tuhin viewed an advertisement online before visiting the dealership. Please provide responsive information.

2. Please Bates-stamp and formally serve the documents you are producing in this case, as required.

3. Your clients' discovery response states that "There weren't any audio /visual recordings or other documents preserved regarding plaintiff's purchase." Nada and Julio Estrada testified that such recordings were taken. Please produce a verified response from your clients explaining why this recording was not made or preserved; when it was destroyed, if applicable; and providing the name and contact information of any individuals hired to manage this system (the "tech guy" about whom Nada testified.)

4. Finally, your clients' discovery responses indicate that "My clients will inform plaintiff of all lawsuits against them alleging violations of TILA, RICO or the NYS General Business Law" and "Mamdoh Eltouby will examine records to determine whether findings were ever entered against them [by the BBB/DCA/DMV]." These responses are already overdue.

We will need this information by April 20th so we have time to prepare for Mr. Eltouby's deposition on the 27th. Please let me know if there will be any problems getting us this information by that date.

Thanks,
Ariana

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